

**IN THE UNITED STATES BANKRUPTCY COURT**  
**Middle District of Alabama**

|                          |   |                   |
|--------------------------|---|-------------------|
| <b>In the Matter of:</b> | } |                   |
|                          | } | Case No. 15-32257 |
| Deborah Holcombe         | } |                   |
|                          | } | Chapter 13        |
|                          | } |                   |
| <b>Debtor</b>            | } |                   |

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**OBJECTION TO TRUSTEE'S MOTION TO DISMISS**

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COMES now the debtor and objects to the Trustee's Motion to Dismiss based upon the following:

1. The debtor filed this case on August 17, 2015.
2. Since the filing of the Chapter 13 case, the debtor became behind in payments to the Trustee because she lost her job.
3. The debtor is now able to resume payments to the Trustee because she is receiving unemployment and has resumed payment.

Wherefore, premises considered, the debtor objects to the case being dismissed

Respectfully submitted this the 9 day of May, 2016.

/s/ Joshua C. Milam  
ASB-3046-T99U  
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### **CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the above foregoing motion on all parties listed below by CM/ECF on this day 9 day of May, 2016.

Chapter 13 Trustee, Curtis C. Reding  
Bankruptcy Administrator, Teresa Jacobs